# Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

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In the Matter of	į	
City of Naperville, Illinois	)	Docket No. 02-55
	)	Mediation No. TAM-12225
	Ó	DA 07-2615
and	)	
	)	
Nextel Communications, Inc.	)	

To: Chief, Public Safety and Homeland Security Bureau

# SUPPLEMENT TO CITY OF NAPERVILLE, ILLINOIS STATEMENT OF POSITION

On June 14, 2007, the Associate Chief, Public Safety and Homeland Security Bureau issued a *Memorandum Opinion and Order* ("MO&O") in the captioned matter. The MO&O the Bureau stated that it would consider further documentation of Midwest Public Safety Communications' ("MPSC") request for payment if it would provide more detailed documentation about its work. The Bureau allowed the City of Naperville, Illinois ("Incumbent") seven days to tender the further detail. This supplement provides that further detail.

Two documents are attached. One is a narrative which supports MPSC's request for payment prepared by Wayne Grochowski of MPSC. The other is a spreadsheet detailing the time spent on each task in the month in which it was performed.

The Incumbent asks that the Bureau consider this supplemental information and approve the full amount requested for MPSC in the Request for Planning Funding.

Respectfully submitted,

City of Naperville, Illinois

By Wuche Conner
Marjorie K. Conner

June 22, 2007

Marjorie K. Conner, P.L.L.C. 700 West View Terrace Alexandria, Virginia 22301 as counsel for

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#### To Whom It May Concern:

The FCC's R&O provides for a funding mechanism by which Sprint will pay for the costs of reconfiguring licensee systems which includes planning. Sprint is responsible for the cost of relocating all affected 800 MHz incumbents to new spectrum with comparable technological and operational capabilities. The objective of the planning process is to determine all tasks necessary to reconfigure the licensee's radio system. This will include cost data for all tasks. The primary deliverables coming out of the planning stage are the Implementation Plan and Cost Estimate, which is required to assist the licensee in effectively entering into negotiation of an FRA with Sprint Nextel.

MPSC has already agreed in a Wave 2 Kentucky rebanding project with Sprint stating that 40 hours were required to provide for the RFPF document. This document was not thoroughly completed because we went right to the FRA stage and by-passed the RFPF negotiations. If it was used, I estimated another 12 hours would have been needed to complete, and once submitted another 16 hours to revise due to the correspondence and in depth questions from Nextel. For Napverville it took 8 hours to update to the new TA form Version 2.6. This totals 76 hours (76hrs x \$175 = \$13,300) so my initial request of \$12,860 is in line of what MPSC has already been approved in our Wave 2 FRA. Kentucky's system is a little less complicated with an over 700 subscriber units. Therefore, precedence has already been established between Sprint and MPSC for preparation of the RFPF document.

The attached spreadsheet details the hours used to provide for planning tasks. The hours used were for meetings, emails and phone calls with the City of Naperville, TA and Sprint, as well as preparation of the submitted RFPF document. These planning activities that 800 MHz licensees conduct in preparation for reconfiguration (e.g., inventories, frequency evaluation, development of Cost Estimates, etc.) are used as important inputs to the Cost Estimate, and eventual FRA. All planning costs submitted for approval in the RFPF or Cost Estimate are reasonable and prudent expenses directly related to the retuning of the City of Naperville's 800 MHz system. The following tasks were completed to provide for the preparation and submittal of the RFPF document.

#### Tasks completed:

- 1. Used appropriate TA form listed on website but then had to revise due to updating after already submitting previous version.
- 2. Included all licensee information
- 3. Included call signs subject to reconfiguration
- 4. Completed all cells in the Summary of All Costs table
- 5. Provided relative start and end dates for completion of planning activities
- 6. Provided requested contact information
- 7. Completed all Planning Cost Category tables and provide descriptions of activities/tasks
- 8. Ensured consistency of cost entries and vendor names in the Summary of All Costs table and the information in the internal and vendor tables throughout the document?
- 9. Provided relative start and end dates for completion of planning activities for each Planning Cost Category activity/task
- Included a narrative system description consistent with the system description table and relevant SOW sections
- 11. Included the total number of mobiles and portables in the System Description table
- 12. Described the type of system (I.e. trunked, simulcast technology
- 13. Noted the frequencies that are to be reconfigured and their use (e.g., voice, data, or control)?
- 14. Provided the number of mobiles/portables on the system that are impacted by rebanding? Do total mobile and portables noted match total number of subscriber units
- 15. Compared the frequencies in the RFPF with the FPR
- 16. Determined that adjacent channel analysis and co-channel analysis not required.
- 17. Documented the need to determine the suitability of the proposed frequencies to operate on existing transmit combiners and receiver multi-couplers if Combiner and Receiver Multi-

- coupler Suitability is requested
- 18. Provided justification in accordance with guidance for Intermodulation.
- 19. Determined no Other Frequency Analysis required.
- 20. Described the infrastructure inventory and what data will be collected.
- 21. Described the Subscriber Inventory process. Estimated the number of radios that will be inventoried.
- 22. Determined that extensive Interoperability Planning will be required describing the planning tasks required to determine the methodology and costs to insure the interoperability environment remains in operation throughout the reconfiguration process.
- 23. Described the project management structure, including type of resources and roles.
- 24. Broke out costs to support negotiations with Sprint from those relating to planning activities.
- 25. Documented any "Other" costs.
- 26. Correctly calculated all costs.
- 27. Record all total costs accurately in the Summary of All Costs table.
- 28. Verified that only planning-related activities and costs were used, holding all reconfiguration implementation-related activities and costs for the Cost Estimate for the FRA.

I believe the hours documented here (73.5hours) for MPSC are reasonable and justified in order to reband Naperville with planning for a comparable system. The \$7,210 amount is easily justified but below the amount that is reasonable. At this time, I am requesting the original amount of \$12,860 (73.5 x \$175 = 12,862) be paid to MPSC for services provided as documented above. Also, additional hours will be required to recover mediation costs. If you have any further questions I can be contacted at <a href="mailto:wgrocho498@gmail.com">wgrocho498@gmail.com</a> or 708 932 4858.

Sincerely,

Wayne M. Grochowski MPSC Inc,

## **HOURS BILLED 2006**

Meetings On-Site	PM hours	SE hours	
3/8/2006 System overview	2	2	
4/11/2006 Interoperability meeting	2	2	
4/13/2006 RFPF initial review	2	2	
4/25/2006 Discuss and come up with local cost estimates	2.5	1	
Present personnel costs to date			
Discuss inventory options			
9/14/2006 RFPF final review	2	0	
TOTAL	10.5	7	17.5
RFPF preparation and correspondence 2006	PM	SE	
March	24	8	
April	8	2	
May			
June			
July	8	2	
August			
TOTAL	44	12	56
		TOTAL	72 E
		TOTAL	73.5

PM = project manager \$175/hr SE = system enegineering \$175/hr

73.5hrs x \$175 = \$12862.50

### Certificate of Service

I certify that on this 22<sup>nd</sup> day of June, 2007, a copy of the foregoing Supplement to Statement of Position was sent electronically to the following persons:

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